

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: David Mondragon, Jr., : Chapter 13  
Debtor : No. : 18-12945-pmm

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**Hearing to be Held:**

**Date: September 24, 2020**

**Time: 11:00 am**

**Place: United States Bankruptcy Court  
Courtroom 4<sup>th</sup> Floor  
The Gateway Building  
201 Penn Street  
Reading, Pennsylvania, 19601**

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**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

David Mondragon, Jr., Debtor, by and through undersigned counsel, has filed a Motion to Modify the Chapter 13 Plan (Post-Confirmation).

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT AN ATTORNEY.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before September 21, 2020 you or your attorney must do ALL of the following:

(a). file an answer explaining your position at:

**United States Bankruptcy Court  
Eastern District of Pennsylvania  
The Gateway Building  
201 Penn Street, Suite 103  
Reading, PA 19601**

(b). If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and mail a copy to movant:

Joseph Quinn, Esquire  
Ross, Quinn & Ploppert, P.C.  
192 S. Hanover Street, Suite 101  
Pottstown, PA 19464

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer, United States Bankruptcy Judge on September 24, 2020 at 11:00 A.M., in:

**United States Bankruptcy Court  
Courtroom 4<sup>th</sup> Floor  
The Gateway Building  
201 Penn Street  
Reading, Pennsylvania, 19601**

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you are on the Clerk's Service List and you request a copy from the attorney named in paragraph 1(b).

5. You may contact the bankruptcy clerk's office at (610) 208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

**ROSS, QUINN & PLOPPERT, P.C.**

By: /s/ Joseph Quinn  
Joseph Quinn, Esquire  
Attorney I.D. 307467  
192 S. Hanover Street, Suite 101  
Pottstown, PA 19464  
Ph: (610) 323-5300  
F: (610) 323-6081

Dated: September 1, 2020